

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

Mar 17, 2022

CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA  
BY \_\_\_\_\_ DEPUTY

In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)1900 NW 96th Street, Vancouver, Washington; and  
116 E Cedarcrest Street, Napavine, Washington

Case No. MJ22-5042

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, incorporated herein by reference.

located in the \_\_\_\_\_ Western \_\_\_\_\_ District of \_\_\_\_\_ Washington \_\_\_\_\_, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

| Code Section                                | Offense Description  |
|---|--|
| 21 U.S.C. §§ 841(a)(1),<br>843(b), and 846; | Distribution of controlled substances, possession with intent to<br>distribute, and conspiracy |
| 18 U.S.C. § 1956                            | Money laundering   |

The application is based on these facts:

- ☒ See Affidavit of Samuel Landis, continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.



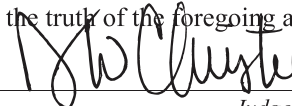
Applicant's signature

Samuel Landis, Special Agent, Drug Enforcement Administration

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or  
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 03/17/2022



Judge's signature

City and state: Tacoma, Washington

Hon. David W. Christel, United States Magistrate Judge

Printed name and title

STATE OF WASHINGTON                    )  
  )        SS  
COUNTY OF CLARK                    )

## AFFIANT BACKGROUND

3. I have had the opportunity to monitor, listen to, review transcripts and line sheets (prepared by linguists) documenting the content of thousands of intercepted conversations involving the trafficking of heroin, methamphetamine, fentanyl, marijuana, and other controlled substances and illegal narcotics, by persons who used some form of code to thwart law enforcement. I also have also interviewed defendants at the time of their

arrests and have debriefed, spoken with, or interviewed numerous drug dealers or confidential sources (informants) at proffer interviews who were experienced in speaking in coded conversation over the telephone. In many of these interviews and debriefings, I was able to speak with these drug traffickers about specific conversations in which they were intercepted pursuant to electronic surveillance. From these interviews, and also from discussions with other experienced agents, I have gained knowledge regarding the various methods, techniques, codes, and/or jargon used by drug traffickers in the course of their criminal activities, including their use of firearms to protect their narcotics related activities and their use of cellular telephones and other electronic devices to facilitate communications while avoiding law enforcement scrutiny.

#### **INTRODUCTION AND PURPOSE OF AFFIDAVIT**

4. This Affidavit is submitted in support of an application to search the following two locations, as further described in Attachments A-1 and A-2, for evidence, fruits and instrumentalities of drug trafficking crimes committed by the drug trafficking organization (DTO), in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846; and Title 18, United States Code, Sections 1956, as further described in Attachment B. The locations that I am requesting authorization to search are identified in bold font throughout this Affidavit.

#### **LOCATIONS TO BE SEARCHED**

- a. Suspected drug stash location and residence of Genaro JACOBO-Velez:  
**1900 NW 96<sup>th</sup> Street, Vancouver, Washington (Premises 1).**
- b. Suspected money stash location and residence of Francisco VAZQUEZ  
Ruelas: **116 E Cedarcrest Street, Napavine, Washington (Premises 2).**

5. The statements contained in this affidavit are based in part on your affiant's training, experience, participation in and knowledge of this investigation, as well as knowledge your affiant learned from various other federal, state and/or local law enforcement agencies, special agents, task force officers, state and local law enforcement

1 officers. Since this Affidavit is being submitted solely for the purpose of establishing  
2 probable cause to obtain this search warrant, your affiant has not included each and every  
3 fact known to me concerning this investigation. Rather, your affiant has only set forth facts  
4 relevant to the question of whether probable cause exists to issue the requested search  
5 warrant.

#### 6 **SOURCES OF INFORMATION**

7 6. Confidential Source 1 (CS-1) referenced herein has worked with the DEA  
8 since 2004 and provides information in exchange for monetary consideration. For this  
9 investigation, CS-1 has been paid less than \$10,000. CS-1 has provided the DEA with  
10 truthful and reliable information in the past, which has been independently corroborated  
11 through DEA investigations. CS-1 has a criminal history that includes a conviction of more  
12 than fifteen years old for fraudulent use of a credit card and a conviction of more than ten  
13 years old for possession of cocaine. Additionally, CS-1 has provided reliable information  
14 during 2020 to more than three different DEA offices, as well as to the United States  
15 Marshal's Service. The information provided continued into 2021. Specific to this case, the  
16 information CS-1 has provided on drug trafficking and other assistance has been  
17 corroborated through physical surveillance and electronic recordings.

18 7. Confidential Source 2 (CS-2) referenced herein has worked with the DEA  
19 since 2015. CS-2 has prior criminal convictions for Resisting/Obstructing and Giving False  
20 Identification to a Peace Officer in 1997, Importation of a Controlled Substance in 1999,  
21 Importation of Methamphetamine in 2000, and Possession/Purchase of  
22 Narcotics/Controlled Substances for Sale in 2006. CS-2 previously provided information  
23 in the past to the DEA in exchange for reduced sentencing for criminal charges, and now  
24 provides information to the DEA in exchange for money. For this investigation, CS-2 has  
25 been paid less than \$10,000 for the information provided related to this investigation. CS-  
26 2 has provided reliable information in the past to the DEA that has been independently  
27 corroborated and has led to past drug seizures and drug-related arrests. Because CS-2 has  
28 provided reliable information that has been independently corroborated and has led to drug

1 seizures and drug-related arrests, I believe that CS-2 is a credible and reliable source of  
2 information.

3 **BACKGROUND**

4 8. In April 2021, DEA Portland agents began investigating a drug trafficking  
5 organization (DTO) shortly after receiving information from CS-1 regarding a Portland-  
6 based kilogram-quantity methamphetamine and heroin distributor. At that time, CS-1  
7 provided agents with details of the persons s/he knew as Fidel GUILLEN Velez and Jose  
8 GUILLEN-Ibarra. Agents later fully identified these individuals as Primitivo VELEZ-  
9 Ibarra and Ricardo GUILLEN-Ibarra, respectively. According to CS-1, Primitivo VELEZ-  
10 Ibarra leads and operates a methamphetamine and heroin DTO in the Greater Portland  
11 Metropolitan area. Further, CS-1's information indicated that Primitivo VELEZ-Ibarra is  
12 assisted by his family members in the distribution of controlled substances, to include his  
13 brother, Ricardo GUILLEN-Ibarra; and his nephew, Genaro Alejandro JACOBO-Velez.

14 9. CS-1's information also indicates that Primitivo VELEZ-Ibarra is a Mexican-  
15 based distribution manager who has operational control over drug distribution cells located  
16 in the Greater Portland Metropolitan area. Agents further learned that Primitivo VELEZ-  
17 Ibarra was seeking out additional methamphetamine and/or heroin customers located in  
18 Portland, Oregon. Based on this information, agents coordinated with CS-1 to introduce  
19 Confidential Source-2 (CS-2) to the Primitivo VELEZ-Ibarra DTO as an individual  
20 interested in purchasing methamphetamine and/or heroin in Portland, Oregon.

21 10. Between April 2021 and August 2021, at the direction of agents, CS-2  
22 arranged and conducted five different controlled purchases for methamphetamine, heroin,  
23 and/or counterfeit oxycodone pills with JACOBO using Jacobo Phone-9076. On some of  
24 the controlled purchases, Richard BARRERA would arrive and meet with CS-2 on behalf  
25 of JACOBO. All of the controlled substances were purchased by CS-2 in exchange for  
26 DEA issued funds. The controlled purchases totaled approximately three pounds of  
27 methamphetamine, approximately two ounces of heroin and approximately 130 counterfeit  
28 oxycodone pills suspected of containing fentanyl—both substances are schedule I & II



1 controlled substances respectively. All of the narcotics acquired from the controlled  
2 purchases have been sent to the DEA Western Regional Lab (WRL) for a qualitative  
3 analysis. Two of the methamphetamine evidence exhibits and the one heroin exhibit field-  
4 tested presumptive positive for their respective drug. Based on my training and experience,  
5 I know counterfeit oxycodone pills often times appear as small, round and blueish in color  
6 with "M/30" stamped on either side of each pill. I also know these illicit pills commonly  
7 contain fentanyl – a schedule II controlled substance. Further, these illicit pills are mostly  
8 derived from Mexico and are transported and distributed throughout the Pacific Northwest.  
9 Before and after each controlled purchase, agents met with CS-2 at a predetermined neutral  
10 location. During that time and for each of the controlled purchases, agents searched CS-2's  
11 person and vehicle to ensure CS-2 was not introducing any firearms, drugs and/or bulk  
12 cash at the meet location; none were found.

13 11. On August 31, 2021, JACOBO travelled north from California into the  
14 District of Oregon while driving a Hyundai Sonata. Agents followed JACOBO to Portland,  
15 where he left the vehicle unoccupied. There, agents arranged to have a narcotics detecting  
16 K-9 deployed near and around the Sonata. This resulted in a positive alert to the presence  
17 of the odor of narcotics near the vehicle. Agents subsequently seized the Sonata and  
18 acquired court authorization to search the vehicle. On September 1, 2021, during a lawful<sup>[1]</sup>  
19 search of the vehicle, agents located and seized approximately 1816.6 gross grams of  
20 substance suspected to be heroin and \$5,029 in United States currency. The substance was  
21 sent to the DEA WRL for a qualitative analysis. The results were positive for heroin.  
22 Thereafter, as described below, agents sought authorization to intercept communications  
23 over JACOBO's cellphone.

24 12. To date, investigators have identified multiple individuals involved with the  
25 DTO, to include Primitivo VELEZ-Ibarra, Ricardo GUILLEN-Ibarra, Roberto  
26 \_\_\_\_\_

27 [1] On September 1, 2021, the Honorable Stacie F. Beckerman, United States Magistrate Judge, District of Oregon,  
28 signed a search warrant allowing agents to search a 2011 Hyundai Sonata displaying Oregon license plate 725LRK  
(3:21-MC-00966).

VASQUEZ-Ramirez, Nansi ALEJANDRE, Genaro JACOBO-Velez, Kain TORRES-Guerrero, Javier LOPEZ-Vasquez, Kimberly PESANTEZ-Carlos, Jose QUINONES-Torres, Nestor NAVARETTE-Salas, David CASANOVA, Melissa PARRISH, Pedro CABRERA-Chavez, Alfredo VAZQUEZ-Arreola, Richard Antonio BARRERA, Alejandro URRUTIA-Avila, Brian ARROYO-Avelino, and others as active members within the DTO.

### **FEDERAL WIRETAPS**

13. On January 3, 2022, agents obtained a Title-III intercept order signed by United States District Court Judge Karin J. Immergut, District of Oregon, in Case Number 3:22-MC-09, authorizing the interception of wire and electronic communications, to include text messages to and from 323-627-4047 (Target Cellphone-1 or TC-1), used by Genaro JACOBO-Velez. The order was executed on January 3, 2022, and intercepts were terminated on February 2, 2022.

14. On February 3, 2022, agents obtained a Title-III intercept order signed by United States District Court Judge Karin J. Immergut, District of Oregon, Case Number 3:22-MC-09, authorizing the interception of wire and electronic communications, to include text messages from 360-998-7386 (Target Cellphone-2 or TC-2), used by Kain TORRES-Guerrero (K. TORRES). The order was executed on February 3, 2022, and intercepts terminated on March 4, 2022.

### **SUMMARY OF PROBABLE CAUSE**

#### **A. Premises 1 – 1900 NW 96<sup>th</sup> Street, Vancouver, Washington**

15. On January 4, 2022, at approximately 2:40 p.m., agents intercepted an outgoing call (Session 105) from Kain TORRES-Guerrero (K. TORRES), using TC-2, to JACOBO, using TC-1. The call occurred in Spanish and was translated into English by DEA-contracted Spanish-speaking linguists.<sup>1</sup> During the call, JACOBO asked K.

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<sup>1</sup> Unless otherwise noted, all calls listed in this affidavit occurred in Spanish and were translated into English by DEA-contracted Spanish-speaking linguists.

1 TORRES, *"Um... listen, man. Um, bro, do you have, do you have a few of the blue ones?"*  
 2 JACOBO then said, *"Shit. Uh-huh. No, I only needed a boat man. It's because... but I was*  
 3 *going to tell you to lend it to me, man."* JACOBO later continues with, *"Because it's for,*  
 4 *it's not for me. It's for another friend of mine. But I would be responsible for it if anything*  
 5 *were to happen."* Based on my training, knowledge and experience I know drug traffickers  
 6 use coded and/or vague language to describe their illicit activities in order to avoid law  
 7 enforcement detection. From this, I believe when JACOBO asked K. TORRES for "blue  
 8 ones" he used coded language to describe counterfeit oxycodone pills suspected of  
 9 containing fentanyl. I believe this is true because the pills are bluish color. Additionally,  
 10 when JACOBO told K. TORRES he needed a "boat," I know from my training and  
 11 experience from previous drug investigations that the use of the term "boat" is coded  
 12 language used by drug traffickers to describe a specific quantity (1000) of counterfeit  
 13 oxycodone pills suspected of containing fentanyl. I believe JACOBO used the terms "blue  
 14 ones" and "boat" to describe the type and quantity of pills desired. The two ultimately  
 15 agreed to arrange a meeting at a later time.

16 16. That same day, at approximately 3:11 p.m., agents intercepted an outgoing  
 17 call (Session 117) from JACOBO, using TC-1 to Jose QUINONES-Torres (QUINONES),  
 18 using Quinones Phone-1353. During call, JACOBO initially told QUINONES he needed  
 19 to go to California. Then JACOBO told QUINONES, *"Fuck. It's because, here's, here's*  
 20 *the deal man..."* and continues with, *"I need the buttons, man, for the shirt. Yeah, I need*  
 21 *a... they're gonna, they're gonna need the... the shirt by, by tomorrow they want it, man."*  
 22 Based on my training and experience, I know drug traffickers use coded and/or vague  
 23 language to describe their illicit activities. I also know from my training and experience,  
 24 and from previous drug investigations, that the term "button" is commonly used by drug  
 25 dealers to describe fentanyl pills. Based on this conversation, I believe when JACOBO  
 26 used the term "buttons" he meant counterfeit oxycodone pills suspected of containing  
 27 fentanyl, given their similar shape and small size to a button. I also believe JACOBO  
 28 indicated that his drug customer(s) were in "need" or "wanted" a supply of the illicit pills.



JACOBO goes on to tell QUINONES that he called "*The K.*" Based on the surrounding intercepted communications described herein, I believe JACOBO was referring to K. TORRES. The conversation continued with QUINONES stating, "*That fool is in Vegas.*" JACOBO asked, "*To pick up?*" which, through my training and experience, I recognize as coded or vague language to describe retrieving a drug supply. QUINONES affirmed by stating, "*Yeah.*"

17. On January 5, 2022, the Honorable Jolie A. Russo, United States Magistrate Judge, District of Oregon, signed a warrant (3:22-MC-00011) authorizing agents to obtain geolocation data pertaining to TC-2. That same day at approximately 1:41 p.m., agents began receiving geolocation data for TC-2 and learned that K. TORRES' device was positioned in Las Vegas, Nevada.

18. On January 6, 2022, at approximately 4:30 p.m., agents intercepted an outgoing text message (Session 366) from JACOBO, using TC-1, to K. TORRES, using TC-2. JACOBO stated, "*What's up, dude? When are you back?*" Based on my training and experience in conjunction with the above intercepted communications, I believe JACOBO asked K. TORRES when he planned to return to Oregon. I further believe JACOBO asked because he intended on purchasing counterfeit oxycodone pills from K. TORRES.

19. At approximately, 9:41 p.m., through geolocation data from TC-2, agents learned K. TORRES was located near the Portland International Airport (PDX Airport). Agents subsequently established surveillance in the area of K. TORRES' residence in Vancouver, Washington.

20. At approximately 10:41 p.m., agents observed a light-colored 2015 Chevrolet Equinox (Equinox) park in the visitor lot of the apartment complex. I recognized K. TORRES in the back seat of the vehicle because the dome light illuminated the rear cab. I observed three individuals occupying the vehicle. However, I was only able to positively identify K. TORRES at that time. The three individuals sat in the car smoking and chatting for roughly thirty minutes. Agents also noted that geolocation data from TC-2 travelled

1 from the PDX Airport and to the area of TORRES' residence. The device was positioned  
2 at TORRES' residence at the same time K. TORRES was observed entering the area.  
3 Further, TC-2 maintained its positioning near K. TORRES' location during the time agents  
4 observed him in the back seat of the Equinox.

5 21. At approximately 10:56 p.m., K. TORRES, using TC-2, replied to JACOBO,  
6 using TC-1, with a text message (Session 397) stating, "*I barely arrived, dude,*" indicating  
7 K. TORRES arrived in the Greater Portland, Oregon Metropolitan area.

8 22. At approximately 10:57 p.m., agents received an outgoing call (Session 400)  
9 from JACOBO, using TC-1, to K. TORRES, using TC-2. During the call, K. TORRES  
10 initially stated, "*I'm back, dude. Already. Just now.*" JACOBO said, "...*It's 'cause, um,*  
11 *so, you know that I told you that I was going to need some.*" Here, based on JACOBO  
12 asking K. TORRES for some "blue ones" or counterfeit oxycodone pills as described in  
13 Session 105 above, I believe JACOBO was referencing that he was interested in obtaining  
14 counterfeit oxycodone pills from K. TORRES. JACOBO added, "*I need two of them, fool.*  
15 *But, look, this is the thing, dude*" and follows up with, "*Basically, dude. Like, the deal*  
16 *would be like this...if you could let me borrow them.*" K. TORRES replied, "*Uh-huh. Yes,*  
17 *dude. I'll let you borrow them, dude.*" Based on my training and experience, as well as the  
18 context gathered from Session 105 above, when JACOBO said he needed "two," he meant  
19 he needed two thousand counterfeit oxycodone pills. Further, when JACOBO asked if he  
20 could "borrow them," I believe JACOBO meant that he would pay for the counterfeit pills  
21 at a later time, to which K. TORRES agreed.

22 23. The conversation transitioned when JACOBO stated, "*I have waters too,*  
23 *dude.*" Through my training and experience, I recognize the term "water" as being  
24 consistent with how drug traffickers describe methamphetamine, given its translucent  
25 appearance. K. TORRES responded with, "*That's awesome that you're telling me, dude.*  
26 *Because, honestly, the, the, the, the, the chick is needing some and she's a bit upset, dude.*  
27 *That I haven't gotten her any.*" Here, based on my training, knowledge and experience, I  
28 believe K. TORRES indicated that he was interested in acquiring methamphetamine so he

1 could provide it to an unknown female. JACOBO and K. TORRES then go into details  
2 about pricing. K. TORRES asked, *"Twenty-four, right?"* JACOBO responded, *"Yeah,*  
3 *dude, twenty-four."* Based on my training, knowledge and experience, I know drug  
4 traffickers use coded and/or vague language to describe their illicit activities. I am also  
5 aware of the current market pricing of methamphetamine. From this, I believe JACOBO  
6 agreed to sell K. TORRES a pound of methamphetamine in exchange for \$2,400. I further  
7 believe, K. TORRES intended on obtaining the methamphetamine in order to redistribute  
8 to the unknown female. The two ultimately decide to talk at a later time.

9       24. On January 7, 2022, at approximately 8:48 a.m., agents intercepted an  
10 outgoing call (Session 413) from JACOBO, using TC-1, to K. TORRES, using TC-2.  
11 During the call, JACOBO said, *"So can I, can I get those real quick, or what?"* K.  
12 TORRES replied, *"Yeah, dude, get over here, dude."* JACOBO then said, *"On Burton.*  
13 *Okay, I'll get over there, dude. I'm on my way."* Based on my training and experience in  
14 conjunction with the context provided in Sessions 400 and 405, I believe JACOBO and K.  
15 TORRES agreed to meet for the purpose of a 2,000 counterfeit oxycodone pill transaction.  
16 I further believe the two agreed to meet at an unknown place located just off NE Burton  
17 Road in Vancouver, Washington, given that it is in close proximity to K. TORRES'  
18 residence, where K. TORRES stayed overnight.

19       25. Thereafter, agents learned TC-1's geolocation data showed JACOBO  
20 positioned at NE Burton Road near TORRES' residence between 8:46 a.m. and 9:01 a.m.  
21 TC-2's geolocation data showed K. TORRES mobile at 8:41 a.m. near the area of NE  
22 Burton Road as well. At approximately 8:56 a.m., TC-2's geolocation data showed K.  
23 TORRES back at his residence. From this, and through my training and experience, I  
24 believe JACOBO met K. TORRES, at an unknown location off NE Burton Road, for the  
25 purpose of obtaining 2,000 counterfeit oxycodone pills, suspected of containing fentanyl,  
26 for the purpose of further distribution. Additionally, following the illicit pill transaction,  
27 geolocation data from TC-1 showed JACOBO return to **Premises 1** at approximately 9:16  
28 p.m. Further, mounted camera footage at **Premises 1** showed JACOBO returning to

1 **Premises 1** around that same time. Due to the low-light conditions, agents were not able  
2 to see if JACOBO was carrying anything when he returned to **Premises 1**. However,  
3 through my training and experience, I know an amount like 2,000 pills is small enough to  
4 be concealed in pants or shirt pockets. From this, I believe JACOBO stored the suspected  
5 2,000 illicit pill at **Premises 1**. I also believe the suspected methamphetamine JACOBO  
6 spoke of in Session 400 was being stored at **Premises 1**.

7 26. On January 7, 2022, at approximately 8:57 a.m., agents intercepted an  
8 outgoing call (Session 423) from JACOBO, using TC-1, to QUINONES, using Quinones  
9 Phone-1353. During the call, JACOBO told QUINONES, *"Let's send the box, dude."*  
10 QUINONES asked, *"Which one? The weed one?"* JACOBO clarified, *"The other one that*  
11 *I have here, dude."* JACOBO added, *"I'm going to open it and I'm going to put inside the*  
12 *other shit, dude. Might as well."* The two go on to talk about plans to send the box out that  
13 same day. However, agents did not receive any additional indication as to whether  
14 JACOBO and/or QUINONES actually mailed the box that day. Based on my training,  
15 knowledge and experience, I know "weed" is a common term used to describe marijuana.  
16 Further, I know drug traffickers use coded or vague language to describe their illicit  
17 activities. From this, when JACOBO said he was going "to put inside the other shit," I  
18 believe JACOBO was referring to placing a separate drug other than marijuana inside of  
19 the box.

20 27. January 10, 2022, at approximately 9:26 a.m., agents intercepted an incoming  
21 call (Session 600) from QUINONES, using Quinones Phone-1353, to JACOBO, using TC-  
22 1. During the call, QUINONES indicated that he was on his way back to Vancouver,  
23 Washington from his workplace. JACOBO asked QUINONES, *"How long do you think?"*  
24 and added, *"Because I'm already done with the box..."* QUINONES subsequently told  
25 JACOBO he was *"forty, fifty"* minutes away. JACOBO ended the conversation with,  
26 *"...Hurry up, then. Bye."* Based on my training and experience as well there being no  
27 indication that JACOBO and/or QUINONES sent the box mentioned in Session 423 above,  
28 I believe JACOBO was speaking about the same box during Session 600, which is believed

1 to contain narcotics. I further believe JACOBO arranged to meet with QUINONES upon  
2 QUINONES' return to Vancouver.

3 28. At approximately 9:43 a.m., agents intercepted a series of text messages  
4 between TC-1, used by JACOBO, and Quinones Phone-1353, used by QUINONES.  
5 JACOBO initiated the series with a message (Session 601) stating, "*6715 NE 63<sup>rd</sup> Street,*  
6 *Unit 103, Vancouver, WA 98661, United States.*" Moments later, JACOBO sent and  
7 additional text message (Session 603) to QUINONES, which stated, "*How long.*"  
8 QUINONES replied (Session 612) with a text message stating, "*20 min.*" Of note, at  
9 approximately 9:51 a.m., through mounted camera footage at **Premises 1**, agents observed  
10 JACOBO exit **Premises 1** carrying a large cardboard box and placing it in the trunk of his  
11 Subaru Legacy (Subaru). JACOBO departed **Premises 1** shortly thereafter.

12 29. At approximately 10:05 a.m., I arrived in the area of 6715 NE 63<sup>rd</sup> Street,  
13 Unit 103, Vancouver, Washington. This address belongs to a "The UPS Store" location.  
14 Upon my arrival, I observed JACOBO sitting in the driver's seat of his Subaru with the  
15 window down and talking to QUINONES. QUINONES was standing outside the Subaru  
16 and talking to JACOBO. A few minutes later, I observed QUINONES walk to the rear of  
17 the Subaru. The trunk subsequently popped opened and QUINONES retrieved a large,  
18 brown-colored cardboard box, roughly the size of QUINONES' torso. See Figure 1.  
19 QUINONES carried the box into the UPS Store.



20  
21  
22  
23  
24 30. At approximately 10:11 a.m., agents received an outgoing call (Session 618)  
25 from JACOBO, using TC-1, to QUINONES, using Quinones Phone-1353. During the call,  
26 JACOBO told QUINONES, "*Next day delivery, man.*" QUINONES replied, "*Yeah*  
27 *alright.*" Here, I believe JACOBO told QUINONES to ship the box via overnight shipping.  
28 At approximately 10:16 a.m., I observed QUINONES exit the UPS Store empty-handed



1 and return to the Subaru. QUINONES sat in the front passenger-side of the Subaru with  
2 JACOBO and the two individuals departed the area a couple minutes later.

3 31. On the same day, Special Agent Alexander Laub and I contacted the manager  
4 at The UPS Store and served an Administrative Subpoena. Agents requested to see a list  
5 of parcels that were dropped off at The UPS Store on January 10, 2022, that were scheduled  
6 for overnight shipping. Management honored the Administrative Subpoena and allowed  
7 agents to look at packages scheduled for overnight shipment. The packages were present  
8 in plain view behind the front desk. I recognized one of the cardboard boxes (Subject  
9 Parcel) as being similar in shape, size and color to the one I observed QUINONES retrieve  
10 from JACOBO's Subaru earlier that same day. Upon further examination of the shipping  
11 label displayed on the Subject Parcel, I learned the sender was listed as "Josue Delatorre"  
12 with a phone number of "314-788-1353." I recognized this phone number as the same  
13 number JACOBO used to contact QUINONES over TC-1 as described above. Based upon  
14 this information, agents coordinated with UPS to have the parcel intercepted and put aside.

15 32. On January 11, 2022, agents coordinated with UPS's security team to retrieve  
16 the Subject Parcel from a UPS warehouse in Vancouver, Washington. Agents seized the  
17 Subject Parcel and transported it to an FBI Safe Streets Task Force (FBI SSTF) secure  
18 location in Vancouver, Washington. There agents arranged to have Washougal Police  
19 Department K-9 Officer Kyle Day assist with his trained narcotics detecting K-9 partner.  
20 It is worth noting, Officer Day's K-9 partner is trained to detect the presence of the odor  
21 of heroin, methamphetamine and cocaine and is not trained to detect the presence of the  
22 odor of marijuana. Officer Day's K-9 partner subsequently alerted to the presence of  
23 narcotics near the Subject Parcel.

24 33. On January 12, 2022, the Honorable Stacie F. Beckerman, United States  
25 Magistrate Judge, District of Oregon, signed a warrant (3:22-MC-00039) authorizing a  
26 search of the Subject Parcel. During a subsequent search, agents located nine individually  
27 vacuumed sealed bags containing marijuana weighing a total of 4,516.2 gross grams.  
28 Agents also found a "Downy Unstoppables" container, an in-wash scent booster, filled with

1 blueish-colored scented pellets. Within the container was a vacuum-sealed bag containing  
2 what I recognized as counterfeit oxycodone pills comingled with the scented pellets. I  
3 know from my training and experience, as well as from other drug investigations, that  
4 counterfeit oxycodone pills, suspected of containing fentanyl pills, often times appear  
5 small, round and blueish in color with "M/30" stamped on either side of each pill, similar  
6 to the ones located in the aforementioned vacuum sealed bag. The pills weighed a total of  
7 170.4 gross grams. The drugs were processed as evidence and shipped, via FedEx, to the  
8 Western Regional Lab for storage and safekeeping.

9 34. Based on the intercepted communications between K. TORRES and  
10 JACOBO described above in conjunction with my training and experience, I believe the  
11 counterfeit oxycodone pills containing fentanyl that agents located in the Subject Parcel  
12 were the same illicit pills obtained by JACOBO from K. TORRES on January 7, 2022.  
13 Based on mounted camera footage at **Premises 1** showing JACOBO carrying the Subject  
14 Parcel from **Premises 1** and to his vehicle, I further believe the marijuana and the illicit  
15 pills were derived from storage at **Premises 1** and that JACOBO uses **Premises 1** to store  
16 his illicit narcotics and proceed thereof.

17 35. Presently and as recently as March 14, 2022, through mounted camera  
18 footage at **Premises 1**, agents have observed JACOBO residing at **Premises 1**. JACOBO  
19 has consistently stayed overnight at **Premises 1** for an extended period of time. Further,  
20 court-authorized geolocation data pertaining to JACOBO's cellphone, 307-343-5333,  
21 maintains consistent overnight stays at **Premises 1**.

22 **B. Premises 2 – 116 Cedar Crest Place, Napavine, Washington**

23 36. On February 12, 2022, at approximately 10:52 a.m., K. TORRES using  
24 TC-2 received a call from 52-332-634-6441 (Lopez Phone-6441), used by Javier LOPEZ-  
25 Vasquez. During the conversation, LOPEZ asked K. TORRES, "*How much paper did you*  
26 *end up gathering? Because my buddy is telling [PH] me that there's a girl that wants to*  
27 *collect the paper.*" TORRES replied, "*Um, well let me count it well.*" Later during the  
28

1 conversation LOPEZ told K. TORRES, *“Where is, where is, um, Australia? Or what’s it*  
 2 *called? No, Australia, or what did he/she say? Australia? No, no. Not Australia.*  
 3 *Um...Australia. He/She said she was in Australia, who knows what, in Vancouver.*  
 4 *Australia?”* K. TORRES replied, *“Okay, let me count it well.”* LOPEZ then finished the  
 5 call by stating, *“Yeah. If you want, if you want, count it. Count it there right now so that,*  
 6 *that I could park you guys somewhere so you can see her.”*

7 37. Based on my training, knowledge and experience, I know drug traffickers  
 8 rarely use plain language, but instead use vague language, coded jargon, and/or slang when  
 9 referencing drug distribution or activities related to it in order to avoid detection by law  
 10 enforcement. When LOPEZ asked K. TORRES, *“How much paper did you end up*  
 11 *gathering?”* I believe LOPEZ is using coded language to describe money or currency that  
 12 was earned from selling narcotics. LOPEZ continued by saying *“...my buddy is telling*  
 13 *[PH] me that there’s a girl that wants to collect the paper.”* I further believe LOPEZ was  
 14 speaking about an unidentified female who intended on collecting the *“paper”* on behalf  
 15 of LOPEZ’s friend.

16 38. At approximately 11:21 a.m., K. TORRES, using TC-2, called LOPEZ, using  
 17 971-895-6595 (Lopez Phone-6595). K. TORRES started the call by telling LOPEZ, *“Hey!*  
 18 *Uh, I have twenty two (22) four hundred (400).”* LOPEZ responded with, *“Well, I feel like,*  
 19 *like you should take the twenty two (22).”* Right? Once and for all to, to pay the one (1)  
 20 and, and they could give us the other half, so we could owe the half and all of that would  
 21 be left for us. Right?” Both subjects continued the conversation about what was owed to  
 22 them from their drug-customers base. At the end of the call LOPEZ told K. TORRES again,  
 23 *“...So then uh... so then, uh... Complete the twenty two (22), let’s order the twenty two*  
 24 *(22), fuck it all...”*

25 39. Based on my training, knowledge, and experience, I believe K. TORRES was  
 26 giving LOPEZ the final count of the money (i.e., drug proceeds) and explained that he was  
 27 in possession of \$22,400. LOPEZ then directed K. TORRES to *“take the twenty two (22).”*  
 28 *“Right? Once and for all to, to pay the one (1) and, and they could give us the other half,*

1 *so we could owe the half and all of that would be left for us. Right?"* LOPEZ told K.  
2 TORRES to take "22" or \$22,000 and pay the one, then K. TORRES could receive the  
3 other half. Additionally, based on my previous knowledge of this case through intercepted  
4 communications over TC-2, I know that K. TORRES primarily sells heroin and counterfeit  
5 oxycodone pills. When LOPEZ told K. TORRES to pay the "one," I believe LOPEZ was  
6 referring to a one-kilogram debt that was owed to the organization. I recognize \$22,000 as  
7 being consistent with the approximate wholesale price point of a kilogram of heroin in this  
8 region. Furthermore, LOPEZ stated they could then receive the "half." I believe the "half"  
9 is in reference to one half of a kilogram or a half-kilogram of heroin.

10 40. At approximately 12:21 p.m., K. TORRES, using TC-2, received another  
11 phone call from LOPEZ, using Lopez Phone-6441. During the call, LOPEZ stated, *"The*  
12 *girl is there but, she doesn't know her way around. They don't know their way around.*  
13 *Um... Do I send her an address? Or send me an address to send it, no? Hello?"* K.  
14 TORRES responded by saying, *"Uh, do I send you the address of here, of the apartments?"*  
15 LOPEZ ended the call by telling K. TORRES, *"There? There, to the three thousand*  
16 *(3,000)? Uh. Let me look for it then and I'll, I'll send it."* From previous knowledge of this  
17 investigation and my knowledge K. TORRES' residence at that time, I know that the  
18 "3000" address is in reference to K. TORRES apartment complex, which has a listed  
19 address of 3000 NE 109<sup>th</sup> Ave, Vancouver, Washington. I believe LOPEZ then directed  
20 the "girl" who was supposed to retrieve the money from K. TORRES' at his apartment  
21 complex.

22 41. At approximately 12:45 p.m., K. TORRES, using TC-2, received a phone  
23 call from LOPEZ, using Lopez Phone-6595. During the call, LOPEZ told K. TORRES that  
24 the female was present at his residence and stated, *"She said she went in on the right hand*  
25 *side. A little Honda... or, gold color, or who knows what she said."* K. TORRES then said  
26 he was on his way and agreed to give the unidentified female, "22," or \$22,000 derived  
27 from the sales of narcotics.  
28

42. At approximately 12:50 p.m., agents established surveillance in the area of K. TORRES' apartment. K. TORRES was then observed walking from the direction of his apartment and toward the front visitor's parking lot of the complex. K. TORRES was carrying a grey-colored handbag and was holding his cellphone to his ear as he walked eastbound through the parking lot and to a gold-colored Honda sedan. Moments later, agents observed the gold-colored Honda sedan, exit the area of TORRES' apartment complex. Agents followed the Honda as it departed the area. Through a law enforcement database check, agents learned the vehicle's registration returned to Artemio HERNANDEZ (A. HERNANDEZ) of 1610 Windsor Ave, Centralia, Washington. Furthermore, during the initial communications with LOPEZ that day, LOPEZ though the unidentified female was traveling from "Australia." I believe LOPEZ actually meant "Centralia" given the similarity of pronunciation.

43. At approximately 12:54 p.m., K. TORRES, using TC-2, called LOPEZ, using Lopez Phone-6595. K. TORRES told LOPEZ that he saw "*her*" in the "*old Honda.*" LOPEZ replied, "*Oh. That girl, that girl only goes over there, up there for paper and that's it.*" K. TORRES stated, "*Uh-huh. Yes because she didn't give me anything...*" LOPEZ proceeded to tell K. TORRES "*No, no, no. The, the other one is going to give you the half...*"

44. Based on my training, knowledge, and experience, I know that DTOs are compartmentalized within their overall operations and oftentimes separate money and drugs. When LOPEZ told K. TORRES, "*that girl only goes over there, up there for paper and that's it,*" I believe LOPEZ was explaining that the unidentified female only handles the money derived from the sales of drugs. LOPEZ further explained, "*the other one is going to give you half.*" Here, I believe LOPEZ demonstrates the compartmentalization of the DTO by stating the unidentified female's role was specifically to take the money and that a separate unidentified individual would supply K. TORRES with the "half." As previously mentioned, I believe a "half" to be a half-kilogram of suspected heroin.



45. At approximately 2:20 p.m., agents followed the Honda exiting Interstate I-5 and to **Premises 2**. Almost immediately after arrival of the Honda, a purple-colored Chevrolet Malibu (Malibu) displaying Washington license plate “BNV3147” arrived at **Premises 2**. Through a subsequent law enforcement database check, agents learned the Malibu’s vehicle registration returned to Francisco VAZQUEZ-Ruelas and the address of **Premises 2**. Agents confirmed VAZQUEZ-Ruelas’ identity as the driver of the Malibu by comparing their visual observations with Francisco VAZQUEZ-Ruelas’ driver’s license. They are one and the same.

46. During the same time the surveillance was occurring at **Premises 2**, agents from the DEA Tacoma Office checked the registered address of the Honda, which is 1610 Windsor Ave. Through visual surveillance at **Premises 2**, agents located a number of vehicles including a Silver Ford Mustang bearing Washington registration of “AYR2649,” registered to Fredy HERNANDEZ (F. HERNANDEZ). Agents also located a Ford Edge bearing Washington registration of “BCS7690,” registered to F. HERNANDEZ. Agents located and observed Washington driver’s license photos of both subjects.

47. Through a comparison of agents observations and F. HERNANDEZ’s Washington Driver’s License, agents identified the driver of the Honda as F.HERNANDEZ. Agents then watched F. HERNANDEZ exit the Honda along with the unidentified female passenger. Agents observed F. HERNANDEZ walk to the trunk of the vehicle and remove the same bag K. TORRES was carrying to the Honda earlier that same day. F. HERNANDEZ carried the bag into **Premises 2**. Agents maintained surveillance in the area for approximately an hour, and no further activity occurred at the residence.

48. Later, through law enforcement database checks, agents learned the Ford Mustang and the Ford Edge identified at 1610 Windsor Ave were owned by “Luque’s Auto Sales,” located at 1440 S Gold St, Centralia, Washington. Through an additional law enforcement database check, agents learned Luque’s Auto Sales has been previously identified in at least two past DEA investigations, dated from 2010 and 2016 respectively. These investigations indicate that Luque’s Auto Sales is a business believed to be involved

1 in the laundering of proceeds derived from the sales of drugs. Through my training and  
 2 experience, I have learned that establishments, similar to Luque's Auto Sales, use  
 3 legitimate business practices as a way to cover for the influx of drug proceeds into their  
 4 business. This allows the businesses to send money back to Mexico on behalf of a DTO.

5 49. Additionally, on March 16, 2022, agents conducting surveillance near  
 6 **Premises 2** observed two vehicles located at **Premises 2**. Through a subsequent law  
 7 enforcement database check, agents learned both vehicles were registered to VAZQUEZ  
 8 and listing the same address as **Premises 2**. Based on the foregoing, I believe that K.  
 9 TORRES provided F. HERANDEZ and the unidentified female with \$22,000 in drug  
 10 proceeds in order to pay a drug debt. I also believe those proceeds were taken to **Premises**  
 11 **2** for storage in preparation to be laundered back to Mexico. Based on my training,  
 12 knowledge, and experience, I believe **Premises 2** is being used by the DTO as a location  
 13 to store bulk cash derived from the sales of drugs.

#### 14 C. PERTINENT KNOWLEDGE BASED ON TRAINING AND EXPERIENCE

15 50. Your affiant knows based on his training and experience that  
 16 methamphetamine, cocaine, and heroin are controlled substances under the Controlled  
 17 Substances Act. In your affiant's experience, and the experience of other law enforcement  
 18 agents involved in this investigation, the illicit distribution of such controlled substances is  
 19 frequently a continuing activity that occurs over months and/or years.

20 51. Based on your affiant's training and experience, and participation in this  
 21 investigation, as well as numerous other investigations involving the illegal trafficking of  
 22 controlled substances, your affiant knows:

- 23 a. That drug traffickers and associates who work with them maintain  
 24 on hand large amounts of U.S. currency in order to maintain and  
 25 finance their ongoing drug business, or as drug proceeds;
- 26 b. That drug traffickers known to traffic in one form of illegal drug,  
 27 such as methamphetamine, often will also traffic in other illegal  
 28 drugs, such as cocaine, heroin, Oxycodone, PCP, MDMA, and or  
 Fentanyl;

- 1 c. That drug traffickers and those who assist them maintain books,  
2 records, receipts, notes, ledgers, airline tickets, money orders,  
3 cashier check receipts and other papers relating to the  
4 transportation, ordering, sale, and distribution of controlled  
5 substances, even though such documents may be in code. That  
6 drug traffickers commonly "front" drugs (provide controlled  
7 substances on consignment) to their clients, and that records are  
8 maintained by such dealers and those who assist them so they can  
9 account for their drugs and the monies owed for these illegal  
10 drugs; that the aforementioned books, records, receipts, notes,  
11 ledgers, etc., are commonly maintained where drug traffickers  
12 and those who assist them have ready access to them, i.e., homes,  
13 offices, automobiles and storage places;  
14  
15 d. That it is common for drug traffickers and those who assist them  
16 to conceal or secure drugs and other contraband, proceeds of drug  
17 sales and/or records of drug transactions, drug sources, and drug  
18 customers in secure locations within residences, businesses,  
19 offices, safe houses, garages, storage buildings, safes, vaults, and  
20 obscure locations such as storage containers buried underground,  
21 in order to conceal such items from law enforcement authorities;  
22  
23 e. That persons involved in drug trafficking and those who assist  
24 them conceal caches of drugs, large amounts of currency,  
25 financial instruments, precious metals, jewelry, and other items  
26 of value and/or proceeds of drug transactions, and evidence of  
27 financial transactions relating to obtaining, transferring,  
28 secreting, or spending of large sums of money made from  
engaging in drug trafficking activities in their residences, other  
safe houses, businesses, offices, garages, storage buildings, safes,  
vaults, safety deposit boxes and/or automobiles;  
f. That drug traffickers and those who assist them often keep  
paraphernalia for packaging, cutting, weighing, manufacturing  
and distributing controlled substances, and that such  
paraphernalia often includes, but is not limited to, scales, plastic  
wrap, plastic bags, and aromatic substances such as soap, dryer  
sheets, wood shavings, heat sealers and plastic wrapping, which  
are used to mask the odor of illegal drugs in an attempt to avoid  
detection by drug detection dogs and law enforcement;  
g. That it is common for drug traffickers and those who assist them  
to deal/possess stolen weapons or goods and exchange drugs for  
such weapons or goods, and these weapons are commonly used

1 by drug dealers as an item of investment and for protection from  
2 robberies by other drug dealers, and often are altered to fire fully  
3 automatic;

4 h. That when drug traffickers and those who assist them collect  
5 proceeds from the sale of illegal drugs, they often attempt to  
6 legitimize these profits; that to accomplish this goal, drug  
7 traffickers use sources, including but not limited to, foreign and  
8 domestic banks and their attendant services, cashier's checks,  
9 money orders, wire transfers, and bank drafts;

10 i. That persons involved in the distribution/sale, manufacture or  
11 smuggling/transportation of narcotics (i.e. drug trafficking) and  
12 persons who assist them often communicate with each other to  
13 further their drug trafficking activities. Such communications are  
14 most commonly accomplished via cellular telephone. Your  
15 affiant knows that drug traffickers and persons who assist them  
16 maintain contact telephone numbers, as well as other information  
17 such as names, nicknames, addresses, email addresses,  
18 photographs, video recordings, text messages and such,  
19 pertaining to their drug trafficking associates and coconspirators  
20 within the memory of their cellular telephone(s);

21 j. That drug traffickers and those who assist them frequently take,  
22 or cause to be taken, photographs and/or videos of themselves,  
23 their associates, their property, and their product, and that these  
24 traffickers usually maintain these photographs and/or videos in  
25 their residences, offices, cellular telephones, computers, other  
26 electronic data storage means and other places or devices under  
27 their control. Additionally, that this stored data can provide  
28 evidence of criminal activities as it is not an uncommon practice  
for persons engaged in drug trafficking to photograph and/or  
record themselves and other coconspirators engaging in activities  
that further their drug trafficking;

k. That drug traffickers and those who assist them frequently  
employ the use of coded language and avoid explicit references  
to narcotics, locations, names, amounts, times and dates. Drug  
traffickers conduct most of their drug transactions in cash in order  
to avoid a paper trail of their drug transactions and proceeds. Drug  
traffickers go to extreme measures to avoid law enforcement  
surveillance and investigations, such as the development of  
aliases, use of false social security numbers, the use of varying  
cellular telephones, the use of pre-paid calling cards, the use of

other individuals' names and addresses (either true or fabricated) to subscribe to telephones, pagers, utilities, and to acquire assets, such as vehicles;

1. That there are many reasons why criminal offenders maintain evidence for long periods of time. The evidence may be innocuous when considered alone (i.e. financial, credit card, and banking documents, travel documents, receipts, documents reflecting purchases of assets, personal calendars, telephone and address directories, check books, videotapes and photographs, utility records, ownership records, letters and notes, tax returns and financial records, telephone and page bills, keys to safe deposit boxes, computer hardware and software, text messages, voicemail messages, etc.) but has significant relevance when considered in light of other evidence. The evidence may be highly valuable to the offender and at the same time be of usefulness for evidentiary purposes, such as valuable investments (i.e. art, jewelry, precious metals and stones, real estate, securities), large sums of currency, narcotics or money laundering ledgers, safes, customers lists, receipts or listed locations of storage facilities and/or safe houses, firearms, communications equipment (to include cellular telephones), vehicles, airplanes, vessels, computers;
- m. That drug traffickers and those who assist them often use/consume the drugs that they traffic and manufacture and/or use/consume other controlled substances, and it is not unusual to find personal use quantities of drugs and paraphernalia consistent with the use of these substances on their persons and on their property; and
- n. That drug traffickers and those who assist them often use numerous and various vehicles to conduct narcotics transactions, to store drugs, drug proceeds, and weapons, and to transport drugs from locations inside and outside the United States. These Mexican DTOs compartmentalize their efforts as measure to avoid law enforcement. Given that K. TORRES is located in the Greater Portland, Oregon Metropolitan area, and acts on behalf of Mexican-based leadership, I believe he does not yet possess the ability to communicate with the individuals pertaining to **Premises 2**. I also believe **Premises 2** and the individuals residing at this location continue operations (i.e., stash bulk cash



1 and/or illicit narcotics) despite K. TORRES' arrest because of the  
2 current absent line of communication.

3 **CONCLUSION**

4 52. Based on the information developed during this investigation, your affiant  
5 believes the facts set forth, show **Premises 1 and/or Premises 2** are being used for the  
6 holding and distribution of controlled substances, including methamphetamine in the  
7 Western District of Washington, and/or for the holding and laundering of proceeds of the  
8 unlawful distribution of controlled substances. Your affiant believes JACOBO, K.  
9 TORRES, F. HERNANDEZ, VAZQUEZ, as well as others known and unknown to this  
10 investigation have committed violations of 21 U.S.C. §§ 841(a)(1) (Distribution of  
11 Methamphetamine and Counterfeit Oxycodone Pills containing Fentanyl and/or Possession  
12 with Intent to Distribute Methamphetamine and Counterfeit Oxycodone Pills containing  
13 Fentanyl), 843, and 846 (Conspiracy to Distribute Methamphetamine (a Schedule II  
14 Controlled Substance)), and/or a violation of 18 U.S.C. § 1956 (Money Laundering). It is  
15 your affiant's belief that contraband and the evidence, fruits, and instrumentalities of these  
16 violations will exist in the residence, outbuildings, structures, contained on the properties  
17 known and described in Attachments A-1 and A-2, attached hereto and incorporated herein  
18 by reference.

19  
20 //

21  
22 //

23  
24 //

Sam Fardis

The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone this 17th day of March, 2022.

Sto Christel

HON. DAVID W. CHRISTEL  
United States Magistrate Judge

**ATTACHMENT "A-1"**

1. The residence located at **1900 NW 96th Street, Vancouver, Washington** is a single story residence with an attached garage, light brown in color, with brick trim and a light brown asphalt shingled roof. The residence is located on the north side of NW 96th Street. The number "1900" is located to the left of the front door. See attached photograph of the residence below:



2. Authority to search extends to all parts of the property, including main structure, garage(s), storage structures, outbuildings, and curtilage, and all vehicles, containers, compartments, or safes located on the property, whether locked or not, and the person of JACOBO, where the items described in Attachment B (list of items to be seized) could be found.

**ATTACHMENT "A-2"**

1. The residence located at **116 E Cedarcrest Street, Napavine, Washington** is a two story residence with an attached garage, light blue in color, with white trim and a dark asphalt shingled roof. The residence is located on the east side of E Cedarcrest Street. The numbers "116" appear to the right of the front door. See attached photograph of the residence below:



2. Authority to search extends to all parts of the property, including main structure, garage(s), storage structures, outbuildings, and curtilage, and all vehicles, containers, compartments, or safes located on the property, whether locked or not, and the person of VAZQUEZ, where the items described in Attachment B (list of items to be seized) could be found.



**ATTACHMENT "B"****Particular Things to be Seized**

Your affiant requests authorization to seize the following evidence of violations of 21 U.S.C. §§ 841(a)(1), 846, and 18 U.S.C. § 1956:

a. Any and all controlled substances, including cocaine, heroin, methamphetamine, Oxycodone, PCP, MDMA, and Fentanyl, including in pill form, and paraphernalia for packaging, cutting, weighing, manufacturing, and distributing drugs. Such paraphernalia includes scales, plastic bags, and cutting agents used to adulterate the purity of controlled substances;

b. Firearms, firearms purchase and ammunition receipts, holsters, ammunition and ammunition boxes, firearm ownership documents, gun boxes, firearms cleaning kits;

c. Records relating to the purchase, importation, transportation, sale, distribution and possession of controlled substances, including but not limited to, customer lists, ledgers, log books, documents, receipts, financial statements, telephone notes, telephone answering machine tape recordings of messages from co-conspirators and other communication records, personal telephone and address books, credit records, diaries, airline tickets, passports, and money orders. The aforementioned books, records, receipts, notes, ledgers, etc., are commonly maintained where the drug traffickers have ready access to them: e.g, homes, offices and automobiles;

d. Photographs, including still photos, negatives, slides videotapes, films, undeveloped film, memory cards, and the contents therein, in particular photographs of co-conspirators, subjects posing with illegal firearms in their possession, of assets and/or controlled substances;

e. United States and foreign currency, financial instruments, income tax returns, safe deposit box keys and records, precious metals, jewelry, cryptocurrency wallets, including private keys and seed phrases, and other items of value which are the proceeds of drug transactions and evidence of consequential financial transactions relating to obtaining, transferring, secreting, or spending large sums of money made from engaging in drug trafficking activities in secure locations within their residences, offices, automobiles, garages, and storage buildings, books, records, invoices, receipts, records of real estate transactions, bank statements and related records, gift cards, pre-paid visa cards, American Express Bluebird cards, money drafts, money orders, bank drafts, and cashier's checks, bank checks, safe deposit box keys, and other items evidencing the obtaining, secreting, transfer, concealment and/or expenditure



1 of money. Any and all records pertaining to the rental of self- storage locker units, post  
2 office boxes, U-Haul type trailers or trucks and rental properties;

3 f. Records relating to the attempt by drug traffickers to legitimize profits from the  
4 sale of drugs relating to, for example, foreign banks and domestic banks, and their  
5 attendant services, cashier's checks, money drafts, real estate, and businesses real and  
6 fictitious;

7 g. Records relating to vehicles which are used, or are intended to be used, to  
8 transport, convey, or facilitate the sale, distribution, transportation, importation and  
9 possession of controlled substances, and control of the locations and vehicles searched,  
10 including but not limited to, deeds, escrow documents, real estate records, leases, rental  
11 records, utility bill, telephone bills, personal telephone directories, photographs, keys,  
12 and documents reflecting ownership of automobiles, "pink slips", insurance records,  
13 repair bills, and service records. Indicia of occupancy, residency, rental and/or ownership  
14 of the premise described herein, including, but not limited to utility and telephone bills,  
15 concealed envelopes, rental, purchase or lease agreements and keys;

16 h. Any cell phones. A supplemental search warrant must be requested and  
17 authorized before searching the cell phone.

18 i. Any account holder information and access logs for storage units, and any  
19 payment of unit information.  
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